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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

ROEL GALICIA, individually, and on behalf
of other members of the general public
similarly situated,

Plaintiff,

v.

JIF-PAK MANUFACTURING, LLC, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 37-2020-00005233-CU-OE-CTL

Honorable Kenneth J. Medel
Department C-66

CLASS ACTION

**DECLARATION OF ROEL GALICIA IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND MOTION
FOR ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement; Motion
for Attorneys' Fees, Costs, and Enhancement
Payment; Declaration of Class Counsel
(Edwin Aiwazian); Declaration of Settlement
Administrator (Desirae Burton); [Proposed]
Order Granting Final Approval of Class
Action Settlement and Judgment; and
[Proposed] Order Awarding Attorneys' Fees,
Costs, and Enhancement Payment filed
concurrently herewith]

Date: November 17, 2023
Time: 9:30 a.m.
Department: C-66

Complaint Filed: January 29, 2020
FAC Filed: February 14, 2023
Trial Date: None Set

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I, **Roel Galicia**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Jif-Pak Manufacturing, LLC (“Jif-Pak”) in an hourly-paid and non-exempt position from August 2017 to March 2018. I decided to seek legal advice about my work experiences with Jif-Pak. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Jif-Pak was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and eventually a PAGA representative.

3. I have spent over 18 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff and class and PAGA representative, which included gathering documents concerning my employment with Jif-Pak, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Jif-Pak. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least 10 additional hours speaking with my attorneys about the

1 case, identifying potential witnesses, providing my attorneys with documents and information
2 concerning the case, and also describing policies, practices, and procedures of Jif-Pak.

3 5. As far as the settlement is concerned, I was available to review documents and
4 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
5 agreement and about 4 hours asking questions and discussing the potential settlement with my
6 attorneys before signing the settlement agreement.

7 6. I believe that I have done everything that my attorneys have asked of me and have
8 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
9 and the State of California. I think my efforts helped to get the result obtained in this case, and
10 as a class and PAGA representative, I respectfully request that the Court award me an
11 enhancement payment in the amount of \$7,500.00 for my active participation in this case.
12 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
13 reasonable.

14 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an enhancement payment, as well as my share of the settlement as a class
18 member and as an aggrieved employee.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.

21 Executed this ^{09/20/2022} ____ day of September 2022, at Bonsall, California.

22 Electronically Signed  2022-09-20 18:31:16 UTC - 172.58.27.177
Nintex AssureSign® 1c70f3a9-9600-4279-b783-ad16013006a9

23 Roel Galicia